UNITED STATES COURT OF APPEALS DISTRICT OF COLUMBIA CIRCUIT

DHSC, LLC d/b/a AFFINITY MEDICAL CENTER,

Docket No: 15-1426

Filed: 08/29/2018

15-1499

Petitioner

versus

NATIONAL LABOR RELATIONS BOARD,

Respondent

and

NATIONAL NURSES ORGANIZING COMMITTEE,

Intervenor

PETITIONER'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE MOTIONS TO GOVERN FURTHER PROCEEDINGS

As the Petitioner in the above-captioned case, DHSC, LLC d/b/a Affinity Medical Center (hereafter, the "Hospital") hereby respectfully requests, by and through the Hospital's Undersigned Counsel, a seven (7) day extension of time to file any motions to govern further proceedings in the above-captioned case, through and including September 6, 2018. The Hospital's request for an extension of time is made due to the fact that the Hospital's Undersigned Counsel was hospitalized for three days, from August 27, 2018 through August 29, 2018, due to

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medical complications related to her pregnancy. Neither the Respondent National Labor Relations Board nor the Intervenor National Nurses Organizing Committee oppose the Hospital's request.

WHEREFORE, the Hospital respectfully requests that the Court grant the Hospital's Motion and grant the parties an additional seven (7) days to file any motions to govern further proceedings in the above-captioned case, through and including September 6, 2018.

Dated: Mount Pleasant, South Carolina August 29, 2018

Respectfully Submitted,

____/s/___

KAITLIN A. KASETA, ESQ. Counsel for Petitioner 1809 Carolina Park Boulevard Mt. Pleasant, South Carolina 29466 (860) 307-3223 kkaseta@carmodyandcarmody.com

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CERTIFICATE OF COMPLIANCE FOR PETITIONER'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE MOTIONS TO GOVERN FURTHER PROCEEDINGS

- 1. The Petitioner's Unopposed Motion for Extension of Time to File Motions to Govern Further Proceedings (the "Motion") complies with the type-volume limit of Fed. R. App. P. 32(g)(1) because the Motion contains 148 words.
- 2. The Motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. 32(a)(6) because

the Motion has been prepared in a proportionally-spaced typeface using Microsoft Word in 14-point Times New Roman font.

Dated:	Mount Pleasant, South Carolina
	August 29, 2018

Respectfully Submitted,

____/s/____

KAITLIN A. KASETA, ESQ. Counsel for Petitioner 1809 Carolina Park Boulevard Mt. Pleasant, South Carolina 29466 (860) 307-3223 kkaseta@carmodyandcarmody.com

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CERTIFICATE OF SERVICE

I hereby certify that, on August 29, 2018, I electronically filed the foregoing with the Clerk of the Court of the United States Court of Appeals for the District of Columbia Circuit by using the appellate CM / ECF system.

I certify that the foregoing document was served on all those parties or their counsel of record through the CM / ECF system if they are registered users, or if they are not, by serving a true and correct copy at the addresses listed below:

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Dated: Mount Pleasant, South Carolina August 29, 2018

Respectfully Submitted,

____/s/___

KAITLIN A. KASETA, ESQ. Counsel for Petitioner 1809 Carolina Park Boulevard Mt. Pleasant, South Carolina 29466 (860) 307-3223 kkaseta@carmodyandcarmody.com

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